

EXHIBIT A

Declaration of Brent K. Nakamura

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15 *Ultimate Fighting Championship and UFC*

16
17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

25 Defendant.
26
27
28

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF BRENT K.
NAKAMURA IN SUPPORT OF
DEFENDANT ZUFFA, LLC'S
OBJECTIONS TO PLAINTIFFS'
EXHIBIT LIST DOCUMENTS**

1 I, Brent K. Nakamura, declare as follows:

2 1. I am a member in good standing of the bars of the District of Columbia and the State
3 of California. I am admitted *pro hac vice* to practice before this Court. I am an Associate in the law
4 firm Boies Schiller Flexner LLP (“BSF”), counsel for Zuffa, LLC (“Zuffa”) in the above captioned
5 action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No. 2:15-cv-
6 01045-RFP-PAL.

7 2. I make this declaration in support of Zuffa’s Objections to Plaintiffs’ Exhibit List
8 Documents. Except where otherwise stated, based on my personal experience, knowledge, and
9 review of the files, records, and communications in this case, I have personal knowledge of the facts
10 set forth in this Declaration and, if called to testify, could and would testify competently to those
11 facts under oath.

12 3. Exhibit 1 to this Declaration is a true and correct copy of a document filed as ECF
13 No. 237-1 on November 9, 2016 in the Central District of California in the *Golden Boy Promotions,*
14 *LLC v. Alan Haymon* matter, Case No. 2:15-cv-03378-JFW-MRW.

15 4. Exhibit 2 to this Declaration is a true and correct copy of a document filed as ECF
16 No. 322-14 on January 6, 2017 in the Central District of California in the *Golden Boy Promotions,*
17 *LLC v. Alan Haymon* matter, Case No. 2:15-cv-03378-JFW-MRW.

18 5. Exhibit 3 to this Declaration is a true and correct copy of a document produced by
19 third party Golden Boy Promotions in discovery in this matter bearing the Bates number
20 GBP000001.

21 6. Exhibit 4 to this Declaration is a true and correct copy of a document produced by
22 third party Golden Boy Promotions in discovery in this matter bearing the Bates number
23 GBP000002.

24 7. Exhibit 5 to this Declaration is a true and correct copy of a document filed as ECF
25 No. 237 on November 9, 2016 in the Central District of California in the *Golden Boy Promotions,*
26 *LLC v. Alan Haymon* matter, Case No. 2:15-cv-03378-JFW-MRW.

27 8. Exhibit 6 to this Declaration is a true and correct copy of a document filed as ECF
28 No. 322 on January 6, 2017 in the Central District of California in the *Golden Boy Promotions, LLC*

1 v. *Alan Haymon* matter, Case No. 2:15-cv-03378-JFW-MRW.

2 9. Exhibit 7 to this Declaration is a true and correct copy of a document filed as ECF
3 No. 322-3 on January 6, 2017 in the Central District of California in the *Golden Boy Promotions,*
4 *LLC v. Alan Haymon* matter, Case No. 2:15-cv-03378-JFW-MRW.

5 10. Exhibit 8 to this Declaration is a true and correct copy of a document filed as ECF
6 No. 322-2 on January 6, 2017 in the Central District of California in the *Golden Boy Promotions,*
7 *LLC v. Alan Haymon* matter, Case No. 2:15-cv-03378-JFW-MRW.

8 11. Exhibit 9 to this Declaration is a true and correct copy of a document filed as ECF
9 No. 237-2 on November 9, 2016 in the Central District of California in the *Golden Boy Promotions,*
10 *LLC v. Alan Haymon* matter, Case No. 2:15-cv-03378-JFW-MRW.

11 12. Exhibit 10 to this Declaration is a true and correct copy of a document filed as ECF
12 No. 237-3 on November 9, 2016 in the Central District of California in the *Golden Boy Promotions,*
13 *LLC v. Alan Haymon* matter, Case No. 2:15-cv-03378-JFW-MRW.

14 13. Exhibit 11 to this Declaration is a true and correct copy of a document filed as ECF
15 No. 237-1 on November 9, 2016 in the Central District of California in the *Golden Boy Promotions,*
16 *LLC v. Alan Haymon* matter, Case No. 2:15-cv-03378-JFW-MRW.

17 14. Exhibit 12 to this Declaration is a true and correct copy of a document filed as ECF
18 No. 322-11 on January 6, 2017 in the Central District of California in the *Golden Boy Promotions,*
19 *LLC v. Alan Haymon* matter, Case No. 2:15-cv-03378-JFW-MRW.

20 15. Exhibit 13 to this Declaration is a true and correct copy of a document bearing Bates
21 numbers ZFL-1241786 to ZFL-1241851.

22 16. Exhibit 14 to this Declaration is a true and correct copy of a document bearing Bates
23 numbers ZFL-2508355 to ZFL-2508384.

24 17. Exhibit 15 to this Declaration is a true and correct copy of a document bearing Bates
25 numbers DB-ZUFFA-00007249 to DB-ZUFFA-00007289.

26 18. Exhibit 16 to this Declaration is a true and correct copy of excerpts from the transcript
27 of the May 5, 2017 deposition of Nakisa Bidarian with redboxes added.

28 19. Exhibit 17 to this Declaration is a true and correct copy of excerpts from the transcript

1 of the January 25, 2017 deposition of Denitza Batchvarova with redboxes added.

2 20. Exhibit 18 to this Declaration is a true and correct copy of excerpts from the transcript
3 of the July 17, 2017 deposition of Kirk Hendrick with redboxes added.

4 21. Exhibit 19 to this Declaration is a true and correct copy, in the form of a PDF printout
5 of the document produced natively in Microsoft Excel format and bearing the Bates number ZUF-
6 00096950. Exhibit 19 has a slip sheet indicating that the document was produced in native format
7 appended to the front of the PDF printout of the document. As the Microsoft Excel document has
8 multiple sheets, each page of the PDF printout has the name of the sheet stamped on the lower left
9 hand corner of the page.

10 22. Exhibit 20 to this Declaration is a true and correct copy of excerpts from the transcript
11 of the January 26, 2018 deposition of Professor Andrew Zimbalist with redboxes added.

12 23. Exhibit 21 to this Declaration is a true and correct copy of an article published in
13 2014 from the *Journal of Econometric Methods* by Justin McCrary and Daniel Rubinfeld titled
14 “Measuring Benchmark Damages in Antitrust Litigation.”

15 24. Exhibit 22 to this Declaration is a true and correct copy of an article published in
16 2008 from the *Journal of Competition Law and Economics* by John M. Connor titled “Forensic
17 Economics: An Introduction with Special Emphasis on Price Fixing.”
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19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing facts are true and correct. Executed this 14th day of June, 2019 in Oakland, California.
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22 /s/ Brent K. Nakamura
23 Brent K. Nakamura
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